

IN RE: : CHAPTER 13
:
Natalie D. Crone : No. 18-10945-JKF
Debtor :

OBJECTION TO CERTIFICATE OF DEFAULT

Debtor, by her Attorney David M. Offen, objects to the Certificate of Default and requests a hearing as Debtor has informed her counsel that the mortgage company has returned monies paid by the debtor and in addition she currently has \$2,500.00 as well on hand to pay the mortgage company.

WHEREFORE, Debtor, respectfully requests this Honorable Court to DENY Movant's request for relief.

Respectfully submitted,

/s/ David M.Offen
David M. Offen
Attorney for Debtor
Suite 160 West, Curtis Center
601 Walnut Street
Philadelphia, PA 19106
215-625-9600

Dated:5/8/19

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: CHAPTER 13
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Objection to LSF10 Master Participation Trust's Certificate of Default was served on May 8, 2019 on the Chapter 13 Trustee, William C. Miller, Esquire by electronic mail and on the following by electronic mail:

Jerome B. Blank on behalf of LSF10 Master Participation Trust
paeb@fedphe.com

/s/ David M. Offen
David M. Offen Esq.
Attorney for Debtor
601 Walnut Street
Suite 160 West
Philadelphia, PA 19106
215-625-9600

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